

GARRITY, GRAHAM, FAVETTA & FLINN

A Professional Corporation

One Lackawanna Plaza

P.O. Box 4205

Montclair, NJ 07042

Telephone: 973-509-7500

Attorneys for Plaintiff,, Hanover Insurance Company

Our File No. 450.17737/FXG

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE - MISCELLANEOUS CASE NO. 05-230

HANOVER INSURANCE COMPANY,	:	UNITED STATES DISTRICT COURT
	:	FOR THE DISTRICT OF NEW JERSEY
Plaintiff	:	
	:	
vs.	:	CIVIL ACTION NO. 05-1591 (JWB)
	:	
CANAL INSURANCE COMPANY	:	SUBPOENA DUCES TECUM
	:	
Defendant.	:	
	:	

TO: Midge Clark c/o Pratt Insurance, Inc.

YOU ARE HEREBY COMMANDED to attend and give testimony at the offices of **Swartz Campbell, 300 Delaware Avenue, Suite 1130, Wilmington, Delaware**, on **December 6, 2005**, at **1:30 p.m.** on the part of plaintiff, Hanover Insurance Company, and that you have and bring with you and produce at the same time and place, the following:

1. All underwriting files, insurance applications, and all motor vehicle insurance policies issued to Christiana Motor Freight since Canal began writing insurance for said insured.
2. Any and all documents indicating the ownership, license plate numbers, VIN Numbers and other information concerning any vehicles insured under any Canal policy issued to Christiana Motor Freight between January 1, 2001 and January 1, 2004.
3. Any and all documents in any way relating to any vehicles which were specifically named on Canal policy number 395905, including information concerning the ownership of said vehicles, their VIN Numbers, license plate numbers, as well as any title documents, registrations or other documents relating to the ownership of said vehicles.
4. Any and all trip leases or other leases pursuant to which Sherman Dunn was to operate vehicles on behalf of Christiana Motor Freight, Inc.

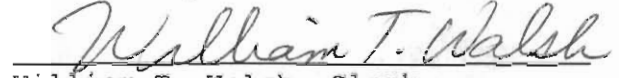
5. Any and all documents terminating any leases pursuant to which Sherman Dunn was to operate vehicles on behalf of Christiana Motor Freight, Inc., including, but not limited to, any and all documents relating to the lease and/or termination of the lease of a 1993 Freightliner tractor bearing VIN No.: 2FUYDXYB4PA416131.
6. Any and all documents relating to the deletion of the aforesaid 1993 Freightliner tractor bearing VIN No.: 2FUYDXYB4PA416131 from the Canal policy number 395905 effective November 1, 2003.
7. Any and all correspondence between Pratt Insurance, Inc. and Canal Insurance Company concerning any policy of motor vehicle insurance issued at any time by Canal Insurance Company to Christiana Motor Freight, Inc. and concerning any vehicles to be insured under said policies.
8. Any and all documents indicating which vehicles were insured by Canal Insurance Company under its policy 395905 as of October 17, 2003.
9. Any and all documents, including title certificates, registrations, documents relating to VIN Numbers or license plate numbers of the tractor and trailer which were being used by Sherman Dunn on October 17, 2003 and which were at the premises of NCS Enterprises, Millville, New Jersey, on October 17, 2003.
10. Any and all correspondence between Canal Insurance Company and Pratt Insurance Inc. in any way relating to Christiana Motor Freight Inc., or any policies of insurance issued by Canal Insurance Company to Christiana Motor Freight Inc.
11. Any and all documents relating to the operation of Christiana Motor Freight Inc. as an I.C.C. carrier.
12. Any and all documents referring to the I.C.C. number and/or decals of Christiana Motor Freight Inc.
13. Any and all documents relating to the decals, signage or other information on the tractor being used by Sherman Dunn on October 7, 2003, as to specifically what information was contained on Mr. Dunn's tractor, including the name and address of Christiana Motor Freight Inc., its I.C.C. number or any other information concerning same.
14. Any and all documents in any way relating to the underwriting of Christiana Motor Freight Inc. by Canal Insurance Company at any time.
15. Any and all documents regarding the addition or deletion of

any vehicles on any policy of automobile, trucks or other motor vehicle insurance issued by Canal Insurance Company to Christiana Motor Freight, Inc. between January 1, 2000 and January 1, 2004.

Failure to comply with this Subpoena will subject you to a penalty, damages in a Civil Suit and punishment for contempt of Court.

Dated: November 15, 2005


FRANK R. CINQUINA


William T. Walsh, Clerk

Attorney for Plaintiff,, Hanover
Insurance Company

PROOF OF SERVICE

On _____, 20____, I, the undersigned, being over the age of 18, served the within Subpoena by delivering a copy thereof to the person named therein, at _____ and by tendering to such person the attendance fee of \$ _____ and mileage of \$ _____ as allowed by law.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: _____

Address for Service: **Pratt Insurance Service, Inc.**
4 Village Square
Smyrna, DE 19977